

Patrick W. Turner General Attorney–South Carolina Legal Department AT&T South Carolina 1600 Williams Street Suite 5200 Columbia, SC 29201 T: 803.401-2900 F: 803.254.1731 pt1285@att.com www.att.com

March 26, 2012

The Honorable Jocelyn Boyd Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Complaint and Petition for Relief of BellSouth Telecommunications, LLC d/b/a

AT&T Southeast d/b/a AT&T South Carolina v. Halo Wireless, Incorporated for

Breach of the Parties' Interconnection Agreement

Docket No. 2011-304-C

Dear Ms. Boyd:

Enclosed for filing is AT&T South Carolina's Motion for Admission *Pro Hac Vice* of J. Tyson Covey in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this Motion as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Enclosure

cc: All Parties of Record

1025058

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2011-304-C

In	Da.	
111	IVC.	

Complaint and Petition for Relief of)
BellSouth Telecommunications, LLC d/b/a)
AT&T Southeast d/b/a AT&T South Carolina v.)
Halo Wireless, Incorporated for Breach)
of the Parties' Interconnection Agreement)

MOTION FOR ADMISSION PRO HAC VICE

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit J. Tyson Covey, to practice *pro hac vice* before the Commission in the above-referenced matters. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Covey, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$250 filing fee have been filed with the Supreme Court.

Respectfully submitted, this $\frac{26}{\text{day}}$ of March, 2012.

BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T SOUTHEAST D/B/A AT&T SOUTH CAROLINA_

PATRICK W. TURNER

General Attorney-AT&T South Carolina

Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

(803) 401-2900

pt1285@att.com

EXHIBIT A



Patrick W. Turner General Attorney–South Carolina Legal Department AT&T South Carolina 1600 Williams Street Suite 5200 Columbia, SC 29201 T: 803.401-2900 F: 803.254.1731 pt1285@att.com www.att.com

March 20, 2012

Ms. Gail Watts
Deputy Clerk for Admissions
South Carolina Supreme Court of Bar Admissions
Post Office Box 11330
Columbia, South Carolina 29211

Re: Complaint and Petition for Relief of BellSouth Telecommunications, LLC d/b/a AT&T Southeast d/b/a AT&T South Carolina v. Halo Wireless, Incorporated for Breach of the Parties' Interconnection Agreement

Docket No. 2011-304-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R, enclosed for filing are the original and one copy of an Application for Admission *Pro Hac Vice* of J. Tyson Covey in the above-referenced matter, along with a Letter of Good Standing with the requested filing fee of \$250.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

MAR 2 0 2012

Patrick W. Turner

S.C. SUPREME COURT

PWT/nml Enclosures 1025075

VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE IN THE STATE OF SOUTH CAROLINA

Re: Complaint and Peti BellSouth Telecommun AT&T Southeast d/b/a Carolina v. Halo Wirele Breach of the Parties' In Agreement	nications, LLC d/b/a AT&T South ess, Incorporated for	Docket No. 2011-304-C	South Carolina Public Service Commission
Plaintiff		Case No.	Court
vs.			
		Mailing Address of Court:	Post Office Drawer 11649, Columbia, South Carolina 29211
Defe	ndant		
Comes now <u>J. Tyson C</u>	ovey, applicant herein,	and respectfully represents the follo	RECEIVE Wing:
1 4 11			MAR 2 0 2012
1. Application 4614 Oakwood Avenue	ant resides at:		
Street Address	,		S.C. SUPREME COURT
Downers Grove	Dupage	Illinois	60515
City	County	State	Zip Code
630-724-0502	•		•
Telephone			
2. Applic Brown LLP, with office		n member of the law firm of (or pract	ices law under the name of) Mayer
71 South Wacker Drive Street Address	2		
<u>Chicago</u>	Cook	<u>IL</u>	<u>60606</u>
City	County	State	Zip Code

- 3. Applicant has been retained personally or as a member of the above named law firm by <u>BellSouth Telecommunications</u>, <u>LLC d/b/a AT&T Southeast d/b/a AT&T South Carolina</u> to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.
- 4. Since November 7 of 1991, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of Illinois where applicant regularly practices law. Attached is a certificate of good standing.

312-706-9175 Fax Number

312-701-8600

Telephone

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:		
US Supreme Court	September 5, 2008		
US Court of Appeals for the Fifth Circuit	January 17, 2007		
US Court of Appeals for the Sixth Circuit	February 22, 2000		
US Court of Appeals for the Second Circuit	August 5, 2011		
US Court of Appeals for the Seventh Circuit	December 19, 1991		
US District Court for the Eastern District of Michigan	September 8, 1999		
US District Court for the Northern District of Illinois	December 19, 1991		
Supreme Court of Illinois	November 7, 1991		

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Correct

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Correct

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Correct

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Correct

9. Local counsel of record associated with applicant in this case is <u>Patrick W. Turner</u>, of the <u>BellSouth Telecommunications</u>, <u>LLC d/b/a AT&T Southeast d/b/a AT&T South Carolina</u>law firm, which has offices at: Suite 5200, 1600 Williams Street

Street Address

Richland County 803-401-2900

Telephone

Columbia City

SC State <u>29201</u>

Zip Code

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

No

- 11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.
 - 12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 15th day of March, 2012.

VERIFICATION

STATE OF ILLINOIS

COUNTY OF COOK

I, <u>J. Tyson Covey</u>, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Subscribed and sworn to before me this 15th day of March, 2012.

Notary Public for the State of Illinois

My Commission Expires: $\frac{5/2}{4}$

OFFICIAL SEAL
MARIA E. IZAGUIRRE
Notary Public - State of Illinois
My Commission Expires May 24, 2012

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 16th day of Mary 2012

LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 200 day of 200 12

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Jay Tyson Covey

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 1991 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Wednesday, March 21, 2012.

Carryn Toff Grosboll

Clerk

STATE OF SOUTH CAROLINA)	
)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC d/b/a AT&T Southeast d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Motion for Admission *Pro Hac Vice* of J. Tyson Covey in Docket No. 2011-304-C to be served upon the following on March 26, 2012:

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(South Carolina Telephone Coalition)
(Electronic Mail)

John J. Pringle, Jr.
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, 5th Floor
Post Office Box 2285
Columbia, South Carolina 29202
(Halo Wireless, Incorporatd)
(Electronic Mail)

Troy P. Majoue
Steven H. Thomas
Jennifer M. Larson
McGuire, Craddock & Strother, P.C.
2501 N. Harwood
Suite 1800
Dallas, Texas 75201
(Halo Wireless, Incorporated)
(Electronic Mail)

W. Scott McCollough McCollough Henry, P.C. 1250 S. Capital of Texas Hwy., Bldg. 2-235 Westlake, Texas 78746 (Halo Wireless, Incorporated) (Electronic Mail)

Nanette Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201 (Electronic Mail)

F. David Butler, Esquire Senior Counsel S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Joseph Melchers Chief Counsel S.C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Jocelyn G. Boyd, Esquire Deputy Clerk S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Nyla M. Laney

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